

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:	§	CASE NO. 18-34658
	§	
HOUTEX BUILDERS, LLC,	§	Chapter 11
	§	
DEBTOR	§	
_____	§	Jointly Administered
	§	
HOUTEX BUILDERS, LLC, 2203	§	
LOOSCAN, LLC, AND	§	
415 SHADYWOOD, LLC,	§	Adversary No. 20-03237
	§	
Plaintiffs,	§	
	§	
v.	§	JURY TRIAL REQUESTED
	§	
HL BUILDERS, LLC f/k/a/	§	
CD HOMES, LLC AND	§	
ANNA WILLIAMS,	§	
	§	
Defendants	§	

INITIAL DISCLOSURES UNDER RULE 26
OF HL BUILDERS, LLC f/k/a CD HOMES, LLC'S

Defendant HL Builders, LLC, formerly known as CD Homes, LLC ("CD Homes"),
discloses the matters set forth by Rule 26(1)(A) of the Federal Rules of Civil Procedure.

(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

Anna Williams
c/o John H. McFarland
Joyce + McFarland LLP
712 Main Street, Suite 1500
Houston, Texas 77002
(713) 222-1114
Contact only through counsel

Ms. Williams is likely to have discoverable information.

CD Homes, LLC
c/o Richard Fuqua
FUQUA & ASSOCIATES, PC
8558 Katy Freeway, Suite 119
Houston, TX 77024
(713) 960-0277

CD Homes, LLC has information about the funds Ms. Williams advanced on behalf of CD Homes, the management fees, expenses, and distributions Ms. Williams received.

Robert F. Parker
c/o Richard Fuqua
FUQUA & ASSOCIATES, PC
8558 Katy Freeway, Suite 119
Houston, TX 77024
(713) 960-0277
Contact only through counsel

Mr. Parker acted as the manager of CD Homes and has knowledge of that entity's accounting, revenues, and expenses. Mr. Parker also has knowledge concerning the contracts made the basis of the complaint and the actions of the parties with respect to the contracts.

Charles Foster
c/o Charles M. Rubio
Parkins Lee & Rubio LLP
700 Milam St., Suite 1300
Houston, TX 77002
(212) 763-3331

Mr. Foster managed the plaintiff entities and has knowledge of the amendments and revisions referenced in CD Homes's Answer.

(ii) A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

CD Homes possesses: (i) documents reflecting advancement of funds to Anna Williams; (ii) a consulting agreement between Williams and CD Homes; and (iii) agreements through which CD Homes was obligated to reimburse Williams for advanced funds.

Subject to the execution by the parties of a mutually acceptable confidentiality agreement, CD Homes will produce the documents in its possession, custody, or control. Additional responsive documents in the form of communications passing between the parties and between their lawyers exist and will be marshaled and produced as appropriate.

(iii) A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

Not applicable.

(iv) For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

None.

Respectfully submitted,

FUQUA & ASSOCIATES, PC

/s/ Richard L. Fuqua

Richard L. Fuqua

Texas State Bar No. 075552300

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ATTORNEY FOR DEFENDANT

HL BUILDERS, LLC, f/k/a CD Homes, LLC

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was forwarded by ECF on October 2, 2020 to the parties listed below.

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/s/ Richard L. Fuqua
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